

FRANZ INC.

Memo

To: Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

From: Richard Franz

Date: 1/29/2019

Re: **EB Docket No. 06-36** / CPNI Certificate for Franz Inc.

Please find enclosed the annual CPNI Certification filing for Franz, Inc. (Filer ID: 822766).

Please don't hesitate to call me at 303.245.0209 if you have questions or comments regarding the enclosed material.

Best Regards,



Richard Franz

President

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2019** covering the prior calendar year of 2018.

Date filed: **January 30th, 2019**

Name of company covered by this certification: **Franz, Inc.**

Form 499 Filer ID: **822766**

Name of signatory: **Richard Franz**

Title of signatory: President

I, Richard Franz, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Signed: _____

Richard Franz
Franz, Inc.
President

Attachments: Statement explaining CPNI procedures - [Attachment – A]

Attachment – A

**Accompanying Statement to Annual CPNI Compliance Certificate for
Franz, Inc.
ID: 822766**

Franz, Inc. operates with the following procedures to ensure that the company is in compliance with 47 C.F.R. Part 64, Subpart U, as follows:

Employee Training and Discipline

Franz, Inc trains and obligates all employees, sub contractor and sales agents with access to Customer Proprietary Network Information (CPNI) , to protect the confidentiality of CPNI by requiring compliance with Franz, Inc.’s Customer Proprietary Network Information Policy (the “Policy”).

Franz, Inc. requires all employees, sub contractors and sales agents with access to CPNI to confirm receipt of the Policy that they have read and understand the Policy. Failure to follow the Policy may result in disciplinary action or termination of employment.

Sales and Marketing Campaign Approval

Since March of 2004, Franz, Inc. no longer actively markets telecommunications services to the public. However, if this status changes all new sales and/or marketing campaigns will require executive management approval.

In addition, Franz, Inc operating Policy strictly forbids selling CPNI data to third-party entities for the purpose of sales or marketing.

Data Maintenance Requirements

Franz, Inc. implemented a system by which Customer’s CPNI can be established prior to the use of CPNI.

Franz, Inc. requires that Customer’s CPNI status data and records be maintained for a minimum of one (1) year.

Review Process

Franz, Inc requires Executive review and approval of any CPNI release or disclosure.

Customer Approval and Customer Authentication Method

Franz, Inc. will only release and/or disclose CPNI to an authorized customer contact directly, upon receiving a written request from customer that has been authenticated. Franz, Inc. requires verification for any customer’s request pertaining to CPNI and will not release CPNI directly to a third-party.

Attachment – A -continued

**Accompanying Statement to Annual CPNI Compliance Certificate for
Franz, Inc.
ID: 822766**

Notice to Law Enforcement and Customers of Unauthorized Access

Franz, Inc. has established procedures under which the appropriate law enforcement agency is notified of any unauthorized access to a customer's CPNI. In addition, Franz, Inc. ensures that all records of any discovered CPNI breaches will be kept for a minimum of two (2) years.

Customer Notification

Franz, Inc will notify our customers of any Change to their CPNI. At minimum, Franz, Inc. will notify a customer in the following circumstances:

- Account record change or creation
- Service related changes
- Changes to authentications system
- Inquiry regarding their CPNI from third-party, government agency or carrier

Compliance Certificates

Franz, Inc. executed a statement, signed by Richard Franz, certifying that he has personal knowledge that Franz, Inc. has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations

Franz, Inc. has prepared and will maintain this Accompanying Statement detailing how operating procedures ensure compliance with CPNI regulations.

Franz, Inc. will provide a summary of all customers complaints received concerning unauthorized release of CPNI and/or provide an explanation of any future actions taken against data brokers on an annual basis.

I hereby agree to Franz, Inc. CPNI procedures:



Richard Franz
President